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Attorneys for Plaintiff Trevor Moss

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

TREVOR MOSS,

Plaintiff,

v.

TIBERON MINERALS LTD.,

Defendant.

Case No.: C 07-2732- SC

**DECLARATION OF JAMES M.
HANAVAN IN SUPPORT OF
OPPOSITION TO DEFENDANT'S
MOTION TO DISMISS FOR *FORUM
NON- CONVENIENS***

Hearing Date: October 26, 2007
Time: 10:00 a.m.
Location: Courtroom 1, 17th Floor
Judge: Hon. Samuel Conti

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Declaration of James M. Hanavan in Support of
Opposition to Defendant's Motion to Dismiss for
Forum Non-Conveniens

1 I, James M. Hanavan, declare:

2 1. I am an attorney at law duly admitted to practice before all the courts of the State
3 of California. I am affiliated with the law firm of Craigie, McCarthy & Clow, attorneys of record
4 for plaintiff Trevor Moss.

5 2. I conducted internet research concerning defendant Tiberon Minerals, Ltd.
6 (“Tiberon”). In the course of conducting this internet research, I printed out a series of press
7 releases, true and correct copies of which are attached hereto as Exhibit “A”. According to these
8 Tiberon press releases, the Ontario “witnesses” listed by Mario Caron sold all of their holdings in
9 Tiberon in December of last year, and relinquished any authority they would otherwise have had
10 to play any role in the determination of Trevor Moss’s bonus at that time.

11 3. Further, according to Tiberon’s press release, Mr. Caron and Tiberon’s other
12 former officers and directors sold and transferred their interest in Tiberon at the same time.
13 Accordingly, each and every “witness” identified by Mr. Caron, including Mr. Caron himself, had
14 contracted away their ability to award Mr. Moss the bonus he had earned in 2006 and cashed out
15 their respective interests in Tiberon. From the sale price in December of last year and the market
16 price at the time he commenced his consulting agreement 16 months before, Mr. Moss calculates
17 that the value of the Tiberon stock increased by more than 55%.

18 4. In a telephone discussion among me, Tiberon’s counsel and the mediator assigned
19 to this case, Tiberon’s counsel informed me that Mario Caron is no longer connected with
20 Tiberon.

21 5. I am over eighteen years of age and have the capacity to perceive and recollect. If
22 called upon to testify, I am competent to testify to the foregoing matters, which are within my
23 personal knowledge.

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2 I declare under penalty of perjury under the laws of the United States that the foregoing is
3 true and correct and that this declaration was executed on October 5, 2007.
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6 /s/ James M. Hanavan
James M. Hanavan
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